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November 9, 2022

**VIA ECF**

Honorable Brian M. Cogan  
United States District Judge  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Brooklyn, NY 11201

*Re: Angelique Hayes v. Everywhere Car Service, Inc., Frunny Vrma, and Pal Winder Singh., et. al., 22-CV- 04832 (BMC)*  
Defendants' Counsel Withdrawal of Appearance o/b/o Everywhere Car Services, Inc.

Dear Judge Cogan:

This Firm represents the defendants, Frunny Vrma, and Pal Winder Singh, (the "Moving Defendants"), in the above-referenced case. By way of reference, this letter motion follows today's Initial Status Conference at which Your Honor directed the undersigned to withdraw his appearance, previously filed for Everywhere Car Service, Inc. ("ECSI") (the "Motion").

By way of further necessary and perhaps required background and explanation, after being retained by the Moving Defendants, the undersigned performed some research with the New York State Secretary of State ("SoS"), as to the status and history of ECSI. With some due diligence, it was discovered that ECSI was incorporated in the State of New York on October 12, 1984 and became inactive on June 24, 1992—more than 30 years ago. (a true and correct copy of the relevant information obtained from the SoS is attached hereto as "Exhibit A"). To be certain, the Moving Defendants never had any affiliation with ECSI, although it appears for a period of time used a d/b/a or a/k/a of Everywhere Car Service.

Because the Moving Defendants never had any affiliation with ECSI and, to this end, were also never served personally with the Complaint in this case, they learned about this instant action only through

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a third-party, unrelated to this action who, by happenstance, through perusal of case filings in this District, came upon this case.

In any event, now that the undersigned learned that the Moving Defendants have no affiliation with ECSI—although they were remiss not to have realized such previously in terms of the difference and distinction, phonetically, legally and otherwise, it is appropriate if not necessary for the undersigned to withdraw as counsel—immediately, and ECSI does not exist, has not for more than 30 years, never had anything to do with that Moving Defendants and, to wit, has no connection to Plaintiff in connection with the allegations and claims in this action.

Finally, and raising the following as soon as practicable, for Your Honor's consideration, the Court set the next conference in this case for November 16, 2022, at 10:30 am. Unfortunately, the undersigned has a conflict at that exact time. Specifically, I must attend an in-person appearance before Judge Saitta in Supreme Court, Kings County, in the case titled and captioned Park Premium Enterprise v. Joseph Kahan, et. al. bearing Index # 505980/2019. As this appearance—with the undersigned representing two of the defendants—is scheduled to cover three separate motions, it is difficult if not impossible for me to ascertain with any level of accuracy or credibility, the amount of time it would take for me to responsibly advocate for my clients and fulfill all my attendant representational obligations in that case, and still timely or at all appear before Your Honor that day. Accordingly, I hereby respectfully request ("Request") that the upcoming conference be adjourned for a later day. By way of information and for expedient scheduling purposes, I am available anytime the following day, November 17, 2022.

I, personally and on behalf of the Moving Defendants, thank Your Honor for the Court's time and courtesies in considering the Motion and the Request.

Respectfully submitted,

BRUCK LLP

By: 

Yair M. Bruck

cc: Attorneys for Plaintiff (VIA ECF)



# Exhibit “A”

# Department of State

## Division of Corporations

### Entity Information

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#### Entity Details



<b>ENTITY NAME:</b> EVERYWHERE CAR SERVICE, INC.	<b>DOS ID:</b> 949640
<b>FOREIGN LEGAL NAME:</b>	<b>FICTITIOUS NAME:</b>
<b>ENTITY TYPE:</b> DOMESTIC BUSINESS CORPORATION	<b>DURATION DATE/LATEST DATE OF DISSOLUTION:</b>
<b>SECTION OF LAW:</b> -	<b>ENTITY STATUS:</b> INACTIVE
<b>DATE OF INITIAL DOS FILING:</b> 10/12/1984	<b>REASON FOR STATUS:</b> DISSOLVED BY PROCLAMATION
<b>EFFECTIVE DATE INITIAL FILING:</b> 10/12/1984	<b>INACTIVE DATE:</b> 06/24/1992
<b>FOREIGN FORMATION DATE:</b>	<b>STATEMENT STATUS:</b> NOT REQUIRED
<b>COUNTY:</b> KINGS	<b>NEXT STATEMENT DUE DATE:</b> 10/31/1986
<b>JURISDICTION:</b> NEW YORK, UNITED STATES	<b>NFP CATEGORY:</b>

[ENTITY DISPLAY](#) [NAME HISTORY](#) [FILING HISTORY](#) [MERGER HISTORY](#) [ASSUMED NAME HISTORY](#)

#### Service of Process Name and Address

**Name:** BERNARD KLEIGER, P.C.  
**Address:** 130 CEDAR ST., NEW YORK, NY, UNITED STATES, 10006

#### Chief Executive Officer's Name and Address

**Name:**  
**Address:**

#### Principal Executive Office Address

**Address:**

#### Registered Agent Name and Address

**Name:**  
**Address:**

#### Entity Primary Location Name and Address

**Name:**  
**Address:**

#### Farmcorpflag

**Is The Entity A Farm Corporation:** NO

Stock Information

Share Value	Number Of Shares	Value Per Share
NO PAR VALUE	100	\$0.00